

EXHIBIT B

23173-00128-KMM

MARSHALL, DENNEHEY, WARNER, COLEMAN & GOGGIN

BY: Kevin M. McKeon, Esquire
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Attorney for Defendants, Wynn's Extended Care, Inc. and National Casualty Company

TIJUANA JOHNSON, on behalf of herself and
other persons similarly situated

Plaintiff(s),

vs.

WYNN'S EXTENDED CARE, INC. &
NATIONAL CASUALTY COMPANY

Defendant(s).

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
CAMDEN COUNTY

DOCKET NO.: CAM-L-5698-11

CIVIL ACTION

**AFFIDAVIT OF PAUL F. GUELMES
IN SUPPORT OF NOTICE OF REMOVAL**

Paul F. Guelmes, being duly sworn according to law hereby deposes and says;

1. I serve as Vice President of Wynn's Extended Care, Inc. I am fully familiar with the facts asserted in this Affidavit. I am authorized to make the statements contained in this Affidavit.
2. Wynn's Extended Care, Inc.'s Administrative Offices are located at 6303 Blue Lagoon Drive, Suite 225, Miami, Florida, 33126.
3. Since February 12, 2005, Wynn's Extended Care, Inc. has sold Used Vehicle Service Contracts in the State of New Jersey through one-hundred ten (110) New Jersey automotive dealerships.
4. Each of the 110 New Jersey automotive dealerships that have sold Wynn's Extended Care, Inc. Used Vehicle Service Contracts are contracted to offer such Service Contracts to purchasers and potential purchasers of used automobiles.

5. Since February 12, 2005, Wynn's Extended Care, Inc. has sold over ten-thousand (10,000) Used Vehicle Service Contracts in the State of New Jersey that are identical or substantially similar to the Used Vehicle Service Contract purchased by the plaintiff in the above-captioned matter.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false that I am subject to punishment.



PAUL F. GUELMES – Vice President
Wynn's Extended Care, Inc.

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